

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

In Re:

ALIYAH WILSON,

Debtor.

Case No. 21-42846-mlo  
Chapter 7  
Judge Oxholm

**TRUSTEE'S APPLICATION FOR  
AUTHORITY TO EMPLOY SPECIAL COUNSEL**

Wendy Turner Lewis, Chapter 7 Trustee for the estate of Aliyah Wilson (the “Debtor”), by her attorneys, Bernardi, Ronayne & Glusac, P.C., states:

1. On March 31, 2021 (the “Petition Date”), the Debtor filed a voluntary petition under Chapter 7 of the U.S. Bankruptcy Code (the “Code”).

2. Wendy Turner Lewis is the duly appointed Chapter 7 Trustee of the Debtor’s estate.

3. Prior to the Petition Date, the Debtor filed a lawsuit in the U.S. District Court for the Eastern District of Michigan to enforce her civil rights against her employer, captioned as *Aliyah Wilson v. Ford Motor Company, Brian Watkins, Donald Wiggins, Robert Fraogos, A. Sloan. Jimmy Williams. Sherry Sweet, Wissam (Sam) Faraj. Gabriel Green, Brittany Pryor, Bryant Watkins, Kevin Camm, Rolando Kennedy, Andrew Robichaud, Kevin Drager and Samantha B.*, Case No. 19-cv-12784 (the “Lawsuit”).

4. The Trustee seeks to employ special counsel to adequately protect and

prosecute the estate's interest in the Lawsuit.

5. It is the Trustee's opinion that a law firm that specializes in civil rights litigation should be retained as special counsel to protect the estate's interest in the Lawsuit.

6. Prior to the Petition Date, the Debtor retained Hall Makled, P.C. (the "Firm") to prosecute the Lawsuit. The Firm is willing to continue to prosecute the Lawsuit on behalf of the Debtor's estate.

7. It would be in the best interest of the Debtor's estate to permit the Firm, which specializes in civil rights litigation and is familiar with the Lawsuit, to act as special counsel for the Trustee to prosecute the Lawsuit.

8. The Trustee and the Firm have agreed to a one-third contingency fee agreement in connection with the prosecution of the Lawsuit, and the reimbursement of costs and expenses. Attached as Exhibit A is a copy of the proposed Retainer Agreement.

9. All fees and costs incurred by the Firm are subject to Court approval and will be paid only upon application and Court order.

THEREFORE, the Trustee requests that an Order be entered authorizing her to employ Hall Makled, P.C., as her special counsel.

BERNARDI, RONAYNE & GLUSAC, P.C.

Dated: July 20, 2021

/s/Rodney M. Glusac  
Attorney for Trustee  
1058 Maple Street  
Suite 100  
Plymouth, MI 48170  
(734) 416-1780  
rodg@brgpc.com  
(P43756)

## **VERIFIED STATEMENT OF SPECIAL COUNSEL**

Lamont D. Satchel states:

1. I am an attorney licensed in the State of Michigan and a member of the firm of Hall Makled, P.C., whose office is located at 1 23756 Michigan Avenue, Suite 300, Dearborn, Michigan 48124 (the “Firm”).

2. To the best of my knowledge, information, and belief, the Firm does not represent or hold any interest adverse to the estate with respect to the matter on which the Firm is to be employed.

2. To the best of my knowledge, information, and belief, the Firm has no connections with the Debtor, creditors, or any other party in interest, their respective known attorneys or accountants, the United States Trustee or any other person employed by the United States Trustee, except that the Firm was retained by the Debtor pre-petition to prosecute the action for which the Trustee seeks to employ it.

3. I have been advised that the Debtor has numerous creditors, and accordingly, the Firm may have rendered services or had business associations with such creditors or their counsel in the ordinary course of my business, but none of these services have been in connection with, nor impact this proceeding.

4. The Firm is a “disinterested person” within the meaning of Section 101(14) of the Bankruptcy Code.

7. The Firm has not made any agreement to share compensation in this case and I know of no reason why the Firm should not act as special counsel for the Trustee.

8. I declare under penalty of perjury that the preceding statements are true and correct to the best of my knowledge, information, and belief.

Dated: July 20, 2021

/s/Cyril C. Hall  
Cyril C. Hall